

~Firm I. D. No. 22231

PH

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

FLORENCETTA NORFLEET

plaintiff

versus

NATIONAL RAILROAD PASSENGER
CORPORATION d/b/a AMTRAK

defendant

COURT #

2008L009171
CALENDAR/ROOM B
TIME 00:00
Premises Liability

03 NOV 20

AM 10:4

COMPLAINT AT LAW

The plaintiff, FLORENCETTA NORFLEET, by attorneys, MUNDAY & NATHAN, and , makes the following allegations against the defendant, NATIONAL RAILROAD PASSENGER CORPORATION d/b/a AMTRAK:

1. On the 23rd day of August, 2006, the defendant, NATIONAL RAILROAD PASSENGER CORPORATION d/b/a AMTRAK, either owned, operated managed, maintained or controlled certain premises located at AMTRAK Station, in the City of St. Louis, and State of Missouri.

2. On the 23rd day of August, 2006, the plaintiff, FLORENCETTA NORFLEET, was at the loading deck preparing to board the train at the AMTRAK Station, in the City of St. Louis, and State of Illinois.

3. It was the duty of the defendant, NATIONAL RAILROAD PASSENGER CORPORATION d/b/a AMTRAK, to exercise ordinary care and caution to its passenger loading the train.

4. Not regarding the duty as aforesaid, the defendant was guilty of one or more of the following careless and negligence acts

or omissions:


- (a) carelessly and negligently failed to properly inspect the stool that was placed for passengers to step up on during the loading process;
- (b) carelessly and negligently placed the stool on an uneven surface;
- (c) carelessly and negligently failed to secure the stool prior to the plaintiff stepping on the same;

5. As a direct and proximate result of the careless and negligent acts of the defendant, NATIONAL RAILROAD PASSENGER CORPORATION d/b/a AMTRAK, the plaintiff stepped up onto the stool while boarding and it tipped over causing the plaintiff to fall to the ground.

6. As a direct and proximate result of the aforesaid, the plaintiff, FLORENCETTA NORFLEET, suffered injuries of a personal and pecuniary nature, including but not limited to, lost wages, medical expenses, pain and suffering, and physical and emotional trauma, all of which are permanent.

WHEREFORE, the plaintiff, FLORENCETTA NORFLEET, asks judgment against the defendant, NATIONAL RAILROAD PASSENGER CORPORATION d/b/a AMTRAK, in a sum in excess of Fifty Thousand (\$50,000) Dollars, which will fairly compensate the plaintiff for the injuries sustained.

33 North Dearborn Street
Suite 2220
Chicago, IL 60602
(312) 346-5678

MUNDAY & NATHAN,
Attorneys for the plaintiff
By: 
Edward G. Proctor, Jr.

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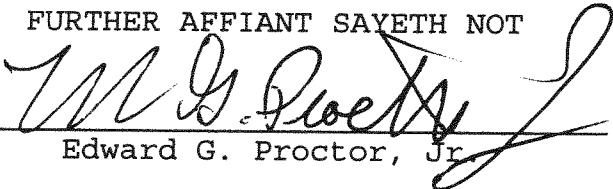
defendant

AFFIDAVIT OF Edward G. Proctor, Jr.


I, Edward G. Proctor, Jr., being duly sworn under oath depose
and state as follows:

1. That I am the attorney who prepared the complaint for the
above-captioned matter.
2. That I believe that this case is worth greater than
\$50,000 based upon information and belief.

FURTHER AFFIANT SAYETH NOT


Edward G. Proctor, Jr.

SUBSCRIBED TO AND SWORN TO BEFORE ME
THIS August 19, 2008.


NOTARY PUBLIC

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

FLORENCETTA NORFLEET,

Plaintiff(s),

versus

NATIONAL RAILROAD PASSENGER
CORPORATION d/b/a AMTRAK,
Defendant(s).

Case No: 08-1-9171

Please Serve:

Ben Crane
National Railroad Passenger Corp
d/b/a Amtrak
525 W. Van Buren, 3rd Floor
Chicago, IL 60606

SUMMONS

To Each Defendant:

YOU ARE SUMMONED and required to file an answer to the Complaint in this case, a copy of which is hereto attached, or otherwise file Appearance, in the office of the Clerk of this Court (located in the Richard J. Daley Center, Chicago, IL) within 30 days after service of this Summons, not counting the day of serve. IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE RELIEF ASKED IN THE COMPLAINT.

To the Officer:

This summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this Summons shall be returned so endorsed. This Summons may not be served later than 30 days after its date.

WITNESS, AUG 26 2008, 2008

Clerk of Court

Edward G. Proctor
MUNDAY & NATHAN
33 N. Dearborn Street, Suite 2220
Chicago, IL 60602-3109
312.346.5678
Attorney No.: 22231

CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

